

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90

**COMMENTS OF THE
NATIONAL ASSOCIATION OF TELECOMMUNICATIONS
OFFICERS AND ADVISORS**

The National Association of Telecommunications Officers and Advisors (“NATOA”) submits these comments in response to the above-captioned Further Notice of Proposed Rulemaking (“FNPR”), released November 9, 2012. NATOA’s membership includes (1) local government officials and staff members from across the nation whose responsibility is to develop and administer communications policy and the provision of communications services for their communities; (2) communities that operate broadband wireline and wireless infrastructure for anchor institutions – serving the needs of government, schools, libraries, first responders, and emergency support personnel; and (3) communities that have constructed, or are in the course of constructing broadband infrastructure to meet public needs, or are offering broadband services to the public within their jurisdictions. These members manage networks in urban, suburban and rural areas across America.

NATOA and its members are representatives of the American people in the most fundamental and immediate sense. We are local governments and agencies, working directly with our respective communities to ensure that they have the most advanced communications

services they need to compete in a global economy and better serve the needs of their residents. At the local level, we are in the unique position to understand what true, affordable broadband access might mean for our citizens and our communities.

We urge the Commission to combine the remaining 2012 Connect America Phase I funding (approximately \$185 million) with any future rounds of Phase I funding and use those funds to target areas that are too costly for the private sector to serve. We believe this approach, rather than using such funds for Phase II, will build on the momentum of the earlier allotment of support.

However, we believe this option should be predicated on a change to the exiting definition of unserved area. We agree with the Commission's proposal that the definition of unserved areas be expanded to include those lacking access to broadband with speeds of 4 Mbps downstream and 1 Mbps upstream. The current speed threshold of 768 kbps downstream and 200 kbps upstream is simply too restrictive and we believe the faster threshold will increase the pool of funding-eligible locations. While we believe that consumers need and desire faster speeds, we recognize that the new proposed speed will ensure that this limited funding goes to areas of greatest need.

We voice our continuing concern, however, as to the accuracy of the National Broadband Map and its depiction of served and unserved areas. While we recognize that efforts have been made to update the map and applaud the Commission's recent proceeding seeking comment on updates, revisions, and other corrections to the map, we believe that tying funding eligibility to the map *may* short change those jurisdictions that are unaware of or are simply unable to take the steps necessary to correct any service coverage misinformation. While we recognize this process permits the allotment of funding in a timely and workable manner, we encourage the

Commission, as it moves forward with its goal to “rapidly and efficiently deploy broadband networks throughout America,” to examine additional means by which the accuracy of the map can be improved and updated in a timely manner.

Likewise, we encourage the Commission to examine what steps should be taken to increase the funding eligibility of additional service operators, including municipal networks and public-private partnerships, to provide broadband services to unserved areas of our country. Many Americans live in areas where there is simply no business case for a private-sector provider to provide high-speed broadband service. As a result, some jurisdictions have opted for “self-help” to construct their own community networks or to partner with others willing to operate the system on behalf of local residents and businesses. If the Commission hopes to realize its broadband goals, it must recognize that we need to enhance, not diminish, the competitive dynamics that will lead to increased investment, innovation, deployment and adoption. If additional providers had been eligible, would \$185 million dollars been left on the table during the initial allotment of Phase I funding? Recently, Chairman Genachowski called for at least one gigabit community in all 50 states. Changes in funding eligibility may very well assist in making that goal a reality.

Finally, we support the concept that carriers be required at the time of funding acceptance to specify the census blocks where they plan to deploy fiber. Doing so will put unsubsidized providers on notice of the planned deployment and should prevent subsequent complaints of unfair competition by subsidized operators.

Conclusion

We commend the Commission for its continuing efforts to ensure broadband deployment to all Americans and its recent actions to improve funding for badly needed projects.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "S. Traylor".

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